

FEDERAL ELECTION COMMISSION

RECEIVED  
FEDERAL ELECTION  
COMMISSION

2710 APR 22 PM 1:39

OFFICE OF GENERAL  
COUNSEL

In the matter of:

U.S. Dry Cleaning Corporation  
David Vitter  
David Vitter for U.S. Senate

MUR No. 6279

COMPLAINT

1. Citizens for Responsibility and Ethics in Washington ("CREW"), Anne Weismann, and Wayne Jerry Phillips bring this complaint before the Federal Election Commission ("FEC") seeking an immediate investigation and enforcement action against U.S. Dry Cleaning Corporation, David Vitter, and David Vitter for U.S. Senate for direct and serious violations of the Federal Election Campaign Act ("FECA").

Complainants

2. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring the integrity of government officials. CREW is dedicated to empowering citizens to have an influential voice in government decisions and in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.

3. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW monitors the campaign finance activities of those who run for federal office and publicizes those who violate federal campaign finance laws. Through its website, press releases, and other methods of distribution, CREW also files complaints with the FEC when it discovers violations of the FECA. Prioritizing campaign finance

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violators and filing complaints with the FEC serves CREW's mission of keeping the public informed about individuals and entities who violate campaign finance laws and deterring future violations of campaign finance law.

4. In order to assess whether an individual, candidate, political committee, or other regulated entity is complying with federal campaign finance law, CREW needs the information contained in receipts and disbursements reports that political committees must file pursuant to the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. CREW is hindered in its programmatic activity when an individual, candidate, political committee, or other regulated entity fails to disclose campaign finance information in reports of receipts and disbursements required by the FECA.

5. CREW relies on the FEC's proper administration of the FECA's reporting requirements because the FECA-mandated reports of receipts and disbursements are the only source of information CREW can use to determine if a candidate, political committee, or other regulated entity is complying with the FECA. The proper administration of the FECA's reporting requirements includes monitoring that all reports of receipts and disbursements required by the FECA are properly and timely filed with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA's reporting requirements.

6. Complainant Anne Weismann is the chief counsel of Citizens for Responsibility and Ethics in Washington, a citizen of the United States, and a registered voter and resident of the state of Maryland. As a registered voter, Ms. Weismann is entitled to receive information contained in reports of receipts and disbursements required by the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. Ms. Weismann is harmed when a candidate, political committee, or other regulated entity fails to report

campaign finance activity as required by the FECA. *See FEC v. Akins*, 524 U.S. 11, 19 (1998), *quoting Buckley v. Valeo*, 424 U.S. 1, 66-67 (1976) (political committees must disclose contributors and disbursements to help voters understand who provides which candidates with financial support). Ms. Weismann is further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting her ability to review campaign finance information.

7. Complainant Wayne Jerry Phillips is a citizen of the United States and a registered voter and resident of the state of Louisiana. As a registered voter, Mr. Phillips is entitled to receive information contained in reports of receipts and disbursements required by the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. Mr. Phillips is harmed when a candidate, political committee, or other regulated entity fails to report campaign finance activity as required by the FECA. *See FEC v. Akins*, 524 U.S. at 19 (citation omitted). Mr. Phillips is further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting his ability to review campaign finance information.

#### Respondents

8. U.S. Dry Cleaning Corporation is a Delaware corporation with its principal place of business in California. David Vitter is a United States Senator representing the State of Louisiana. David Vitter for U.S. Senate is a political committee and the principal campaign committee of David Vitter.

#### Factual Allegations

9. On August 20, 2009, four officers/employees of U.S. Dry Cleaning Corporation, and their spouses, contributed a total of \$38,400 to David Vitter for U.S. Senate:

<u>Name</u>	<u>Title</u>	<u>Date</u>	<u>Amount</u>
-------------	--------------	-------------	---------------

Robert Y. Lee	President/CEO	8/20/2009	\$4,800
Regina Lee	Homemaker	8/20/2009	\$4,800
Tim Denari	Chief Financial Officer	8/20/2009	\$4,800
Mary Denari	Homemaker	8/20/2009	\$4,800
Riaz Chauthani	Director of Acquisitions	8/20/2009	\$4,800
Donna Chauthani	Homemaker	8/20/2009	\$4,800
Jamal Ogbe	Director of Finance	8/20/2009	\$4,800
Cymetria Ogbe	Homemaker	8/20/2009	\$4,800

**See David Vitter for U.S. Senate, Amended October 15<sup>th</sup> Quarterly Report (Jan. 28, 2010) (attached as Exhibit A).**

10. Jamal Ogbe, the former Director of Finance for U.S. Dry Cleaning Corporation, told the *New Orleans Times-Picayune* that "the company was facing financial difficulties in 2009 and hoped that Vitter would help the firm gain access to federal stimulus financing or Small Business Administration Assistance. Ogbe said he was eventually reimbursed by his employer for his \$4,800 contribution." Bruce Alpert Sen. David Vitter Clean Up With Donations From Dry Cleaning Executives, *New Orleans Times-Picayune* (Apr. 8, 2010) (emphasis added) (attached as Exhibit B).

11. Corporate conduit contribution schemes like the one described by Mr. Ogbe rarely involve a single employee. Investigations of such schemes typically uncover a long-standing corporate practice of knowingly and willfully violating multiple provisions of FECA and FEC regulations in order to curry favor with federal officials and obtain an unfair advantage over competitors. *See, e.g.,* MUR 5903 (PBSJ Corporation) (federal contractor utilized an institutionalized pattern of corporate reimbursement of federal campaign contributions over nearly two decades to attempt to influence the awarding of federal contracts); MUR 5666 (MZM, Inc.) (CEO devised and carried out over a three-year period a scheme to reimburse company employees and their spouses for \$78,000 in

illegal campaign contributions to two members of the House of Representatives in an effort to obtain federal funding for the corporation).

12. Here, given Mr. Ogbe's admission, it appears U.S. Dry Cleaning Corporation reimbursed four of its employees and their spouses for \$38,400 in contributions to David Vitter for U.S. Senate in an effort to obtain Senator Vitter's assistance in obtaining federal stimulus funds.

**COUNT I**

13. FECA and FEC regulations both prohibit the making of a contribution in the name of a person other than the true source of the contribution. 2 U.S.C. § 441f; 11 C.F.R. § 110.4(b)(1)(i).

14. By reimbursing employees for contributions made to David Vitter for U.S. Senate, U.S. Dry Cleaning Corporation violated 2 U.S.C. § 441f and 11 C.F.R. § 110.4(b)(1)(i).

**COUNT II**

15. FECA and FEC regulations both prohibit corporations from making contributions in connection with any federal election, including elections for the U.S. Senate. 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.2(a).

16. By reimbursing employees with corporate funds for contributions made to David Vitter for U.S. Senate, U.S. Dry Cleaning violated both 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.2(a).

**COUNT III**

17. FECA and FEC regulations both prohibit a candidate or political committee from knowingly accepting or receiving a contribution from a corporation. 2 U.S.C. § 441b(a); 11 C.F.R. § 114.2(d).

18. By accepting contributions from U.S. Dry Cleaning Corporation, David

and/or David Vitter for U.S. Senate may have violated both 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.2(d).

### CONCLUSION


WHEREFORE, Citizens for Responsibility and Ethics in Washington, Anne Weismann, and Wayne Jerry Phillips request that the Federal Election Commission conduct an investigation into these allegations, declare the respondents to have violated the Federal Election Campaign Act and applicable FEC regulations, and impose sanctions appropriate to these violations and take such further action as may be appropriate, including referring this case to the U.S. Department of Justice for criminal prosecution of any violations of 2 U.S.C. §§ 441b(a) & 441f.

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**Verification**

**Citizens for Responsibility and Ethics in Washington and Anne Weismann hereby verify  
that the statements made in the attached Complaint are, upon information and belief, true.**

**Sworn pursuant to 18 U.S.C. § 1001.**

  
**Anne Weismann**

**Sworn and subscribed before me this 21<sup>st</sup> day of April, 2010.**

  
**Notary Public**

**Lisa Drew  
District of Columbia, Notary Public  
My Commission Expires  
July 31, 2014**

**District of Columbia: SS**

**Sworn to and subscribed before me on  
the 21 day of April, 2010**

**Notary Public's Signature  
My Commission Expires 7/31/2014**

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**EXHIBIT A**



FEC  
FORM 3

**REPORT OF RECEIPTS  
AND DISBURSEMENTS**

For An Authorized Committee

PROPERTY OF THE SENATE  
10 FEB -2 AM 10:42

Circle Use Only

1. NAME OF COMMITTEE (in full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: Senate, type over the lines

David Vitar for U.S. Senate

ADDRESS (number and street)

P.O. Box 8175

Check if different than previously reported. (AO)

Metairie

LA

70019

2. FEC IDENTIFICATION NUMBER ☒

CITY A

STATE A

ZIP CODE A

STATE V DISTRICT

C00004000

3. IS THIS REPORT

NEW (N) OR

AMENDED (A)

LA

4. TYPE OF REPORT (Choose One)

(a) Quarterly Report:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

☒ October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

Convention (12C)

Election on

General (12G)

Runoff (12R)

Special (12S)

In the State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

In the State of

5. Covering Period 07 01 2009 through 09 30 2009

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

William Vanderbrink, Treasurer

Signature of Treasurer

William Vanderbrink, Treasurer

Date

01 28 2010

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

Office Use Only

FEC FORM 3  
FEBRUARY 2010

PERMISSION

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10020081907

**SCHEDULE A (PEC Form 3 )  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBERS: PAGE 02/027  
(check only one)  
☒ 11a ☐ 11b ☐ 11c ☐ 11d  
☐ 12 ☐ 12a ☐ 12b ☐ 14 ☐ 16

Any information copied from such Receipts and Statements may not be sold or used by any person for the purpose of creating publications or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)  
David Vitter for U.S. Senate

<p><b>A.</b> Full Name (Last, First, Middle Initial) David Chastant</p> <p>Mailing Address 11300 Lakesport Dr</p> <p>City State Zip Code Bismarck CA 94005</p> <p>PEC ID number of contributing federal political committee. C</p> <p>Name of Employer HOMESIDE</p> <p>Occupation Homemaker</p> <p>Receipt For: 2010 Primary General X Other (specify) v Primary 2010</p> <p>Election Cycle-to-Date v</p> <p>2400.00</p>	<p>Date of Receipt 08 / 20 / 2009</p> <p>Transaction ID: 80821.C87140</p> <p>Amount of Each Receipt this Period 2400.00</p> <p>Receipt</p>
<p><b>B.</b> Full Name (Last, First, Middle Initial) David Chastant</p> <p>Mailing Address 11300 Lakesport Dr</p> <p>City State Zip Code Bismarck CA 94005</p> <p>PEC ID number of contributing federal political committee. C</p> <p>Name of Employer HOMESIDE</p> <p>Occupation Homemaker</p> <p>Receipt For: 2010 Primary X General Other (specify) v</p> <p>Election Cycle-to-Date v</p> <p>4000.00</p>	<p>Date of Receipt 08 / 20 / 2009</p> <p>Transaction ID: 80821.C87138</p> <p>Amount of Each Receipt this Period 2400.00</p> <p>Receipt</p>
<p><b>C.</b> Full Name (Last, First, Middle Initial) David Chastant</p> <p>Mailing Address 4040 MacArthur Blvd Suite 305</p> <p>City State Zip Code Menlo Park CA 94025-5007</p> <p>PEC ID number of contributing federal political committee. C</p> <p>Name of Employer Ull Engineering Corp</p> <p>Occupation Director of Menopars</p> <p>Receipt For: 2010 Primary General X Other (specify) v Primary 2010</p> <p>Election Cycle-to-Date v</p> <p>2400.00</p>	<p>Date of Receipt 08 / 20 / 2009</p> <p>Transaction ID: 80821.C87137</p> <p>Amount of Each Receipt this Period 2400.00</p> <p>Receipt</p>

SUBTOTAL of Receipts This Page (optional) b

7200.00

TOTAL This Period (last page this line number only) b

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**SCHEDULE A (FEC Form 3 )  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Gateway Page

FOR LINE NUMBER: **PAGE 75 / 87**

(check only one)  
☒ 11a ☐ 11b ☐ 11c ☐ 11d  
☐ 12 ☐ 13a ☐ 13b ☐ 14 ☐ 15

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**NAME OF COMMITTEE (in Full)**

David Viner for U.S. Senate

**A.**

Full Name (Last, First, Middle Initial)

Jim Chaudron

Mailing Address 4040 MacArthur Blvd  
Suite 305

City State Zip Code  
Newport Beach CA 92660-3977

FEC ID number of contributing  
federal political committee. C

Name of Employer  
US Explaining Corp

Occupation  
Director of Marketing

Receipt For: 2010  
Primary ☒ General  
Other (specify) ☐

Election Cycle-to-Date ☒  
4800.00

Date of Receipt

MM / DD / YYYY  
08 / 20 / 2009

Transaction ID: 96021.C87138

Amount of Each Receipt This Period

2400.00

Receipt

**B.**

Full Name (Last, First, Middle Initial)

St. J. Chapiro

Mailing Address 6306 Highway 1

City State Zip Code  
Los Angeles CA 90024

FEC ID number of contributing  
federal political committee. C

Name of Employer  
LAW FIRM

Occupation  
President

Receipt For: 2010  
Primary ☒ General  
Other (specify) ☐

Election Cycle-to-Date ☒  
2000.00

Date of Receipt

MM / DD / YYYY  
08 / 14 / 2009

Transaction ID: 91008.C32251

Amount of Each Receipt This Period

2000.00

Receipt

**C.**

Full Name (Last, First, Middle Initial)

Arthur Glick

Mailing Address 10 Edgewater Drive Apt. 5D

City State Zip Code  
Coral Gables FL 33134

FEC ID number of contributing  
federal political committee. C

Name of Employer  
GSA

Occupation  
Executive

Receipt For: 2010  
Primary ☒ General  
Other (specify) ☐

Election Cycle-to-Date ☒  
1800.00

Date of Receipt

MM / DD / YYYY  
08 / 20 / 2009

Transaction ID: 91008.C32005

Amount of Each Receipt This Period

1800.00

Receipt

**SUBTOTAL of Receipts This Page (addend)**

8000.00

**TOTAL This Period (last page this line number only)**

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**SCHEDULE A (FEC Form 3 )  
ITEMIZED RECEIPTS**

Use separate schedules for each category of the Detailed Summary Page

FOR LINE NUMBER: PAGE 01/01  
(which only one)  
☒ 11a ☐ 11b ☐ 11c ☐ 11d  
☐ 12 ☐ 12a ☐ 12b ☐ 12c ☐ 12d

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NAME OF COMMITTEE (in Full)  
David Villar for U.S. Senate

<p><b>A.</b> Full Name (Last, First, Middle Initial) John Dwyer Mailing Address 205 S Spruce Street City _____ State _____ Zip Code _____ Voter _____ LA 71002 FEC ID number of contributing federal political committee: C Name of Employer NOT A CORP. Occupation OIL PRODUCER Receipt For: 2010 Primary General X Other (specify) <input type="checkbox"/> Primary 2010 1000.00</p>	<p>Date of Receipt M / D / Y Y Y Y 08 / 22 / 2009 Transaction ID: 01000.C23977 Amount of Each Receipt This Period 1000.00 Receipt</p>
<p><b>B.</b> Full Name (Last, First, Middle Initial) May Dwyer Mailing Address 7800 White Lane E140 City _____ State _____ Zip Code _____ Bakersfield CA 93308 FEC ID number of contributing federal political committee: C Name of Employer HOMESIDE Occupation Homemaker Receipt For: 2010 Primary X General Other (specify) <input type="checkbox"/> 2400.00</p>	<p>Date of Receipt M / D / Y Y Y Y 08 / 20 / 2009 Transaction ID: 00021.C27125 Amount of Each Receipt This Period 2400.00 Receipt</p>
<p><b>C.</b> Full Name (Last, First, Middle Initial) May Dwyer Mailing Address 7800 White Lane E140 City _____ State _____ Zip Code _____ Bakersfield CA 93308 FEC ID number of contributing federal political committee: C Name of Employer HOMESIDE Occupation Homemaker Receipt For: 2010 Primary General X Other (specify) <input type="checkbox"/> Primary 2010 4000.00</p>	<p>Date of Receipt M / D / Y Y Y Y 08 / 20 / 2009 Transaction ID: 00021.C27127 Amount of Each Receipt This Period 2400.00 Receipt</p>
<p>SUBTOTAL of Receipts This Page (optional) &gt; 8800.00 TOTAL This Period (see page this line number only) &gt;</p>	

1004283400

10020081007

**SCHEDULE A (FEC Form 3 )  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER: **PAGE 02/007**  
(check only one)  
☒ 11a ☐ 11b ☐ 11c ☐ 11d  
☐ 12 ☐ 13a ☐ 13b ☐ 14 ☐ 15

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NAME OF COMMITTEE (in full)  
David Villar for U.S. Senate

A.

Full Name (Last, First, Middle Initial)  
Tim Doran

Mailing Address 7880 White Lane E140

City State Zip Code  
Bakersfield CA 93309

FEC ID number of contributing  
federal political committee. C

Name of Employer  
Doran & Associates Occupation  
Owner

Receipt For: 2010 Election Cycle-to-Date  
Primary General  
X Other (specify) v  
Primary 2010 2400.00

Date of Receipt

08 / 20 / 2008

Transaction ID: 90821.C87124

Amount of Each Receipt This Period  
2400.00

Receipt

B.

Full Name (Last, First, Middle Initial)  
Tim Doran

Mailing Address 7880 White Lane E140

City State Zip Code  
Bakersfield CA 93309

FEC ID number of contributing  
federal political committee. C

Name of Employer  
Doran & Associates Occupation  
Owner

Receipt For: 2010 Election Cycle-to-Date  
Primary X General  
Other (specify) v  
4800.00

Date of Receipt

08 / 20 / 2008

Transaction ID: 90821.C87125

Amount of Each Receipt This Period  
2400.00

Receipt

C.

Full Name (Last, First, Middle Initial)  
Randy Brown

Mailing Address PO Box 8400

City State Zip Code  
Manteca CA 95221

FEC ID number of contributing  
federal political committee. C

Name of Employer  
Brown Engineering Occupation  
Engineer

Receipt For: 2010 Election Cycle-to-Date  
Primary General  
X Other (specify) v  
Primary 2010 2400.00

Date of Receipt

08 / 01 / 2008

Transaction ID: 90821.C88581

Amount of Each Receipt This Period  
2400.00

Receipt

SUBTOTAL of Receipts This Page (optional)

7200.00

TOTAL This Period (past page into line number only)

FEC Schedule A-1 Form 3 (Revised 02/2008)

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**SCHEDULE A (FEC Form 3 )  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER: PAGE 308 / 407  
(check only one)  
☒ 11a ☐ 11b ☐ 11c ☐ 11d  
12 13a 13b 14 15

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NAME OF COMMITTEE (in Full)  
David Villar for U.S. Senate

Full Name (Last, First, Middle Initial)  
Ramon Lee

Mailing Address 82 Magdalena Dr

City State Zip Code  
Rancho Mission CA 92720-5828

FEC ID number of contributing  
federal political committee. C

Name of Employer  
HOMESIDE  
Receipt For 2010  
Primary ☒ General  
Other (specify) ☐  
Occupation  
Homemaker  
Election Cycle-to-Date ☒  
2400.00

Date of Receipt  
M / D / Y  
08 / 20 / 2008  
Transaction ID: 00821.C87138  
Amount of Each Receipt This Period  
2400.00

Receipt

Full Name (Last, First, Middle Initial)  
Ramon Lee

Mailing Address 82 Magdalena Dr

City State Zip Code  
Rancho Mission CA 92720-5828

FEC ID number of contributing  
federal political committee. C

Name of Employer  
HOMESIDE  
Receipt For 2010  
Primary ☐ General  
☒ Other (specify) ☐  
Primary 2010  
Occupation  
Homemaker  
Election Cycle-to-Date ☒  
4000.00

Date of Receipt  
M / D / Y  
08 / 20 / 2008  
Transaction ID: 00821.C87138  
Amount of Each Receipt This Period  
2400.00

Receipt

Full Name (Last, First, Middle Initial)  
Ramon Lee

Mailing Address 82 Magdalena Dr

City State Zip Code  
Rancho Mission CA 92720-5828

FEC ID number of contributing  
federal political committee. C

Name of Employer  
US Engineering Corp  
Receipt For 2010  
Primary ☒ General  
Other (specify) ☐  
Occupation  
CEO  
Election Cycle-to-Date ☒  
2400.00

Date of Receipt  
M / D / Y  
08 / 20 / 2008  
Transaction ID: 00821.C87138  
Amount of Each Receipt This Period  
2400.00

Receipt

SUBTOTAL of Receipts This Page (optional) ▶

7200.00

TOTAL This Period (and page this line number only) ▶

FEC Schedule A (Form 3) (Revised 08/2008)

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100620082115

**SCHEDULE A (FEC Form 3 )  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER: [PAGE 310/400]  
(check only one)

☒ 11a ☐ 11b ☐ 11c ☐ 11d  
☐ 12 ☐ 13a ☐ 13b ☐ 14 ☐ 15

Any information copied from such Reports and Statements may not be used by any person for the purpose of making contributions or for connected purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

David Villar for U.S. Senate

A

Full Name (Last, First, Middle Initial)

Robert Lee

Mailing Address 82 Kingsiders Dr

City

Rancho Mirage

State

CA

Zip Code

92270-2028

FED ID number of contributing  
federal political committee.

C

Name of Employer  
UL Engineering Corp

Occupation

CEO

Receipt For

2010

Primary

General

X Other (Specify) ☒

Primary 2010

Election Cycle-to-Date ☒

4800.00

Date of Receipt

08 / 20 / 2008

Transaction ID: 80831.C87192

Amount of Each Receipt This Period

2400.00

Receipt

B

Full Name (Last, First, Middle Initial)

R.J. Logan

Mailing Address PO Box 7178

City

Alhambra

State

LA

Zip Code

91806

FED ID number of contributing  
federal political committee.

C

Name of Employer  
Self

Occupation

Doctor

Receipt For

2010

Primary

General

X Other (Specify) ☒

Primary 2010

Election Cycle-to-Date ☒

1425.00

Date of Receipt

08 / 14 / 2008

Transaction ID: 81009.C38276

Amount of Each Receipt This Period

1000.00

Receipt

C

Full Name (Last, First, Middle Initial)

Thomas Johnson

Mailing Address 2801 Ardmore Ct Apt 308

City

Little Rock

State

AR

Zip Code

72207

FED ID number of contributing  
federal political committee.

C

Name of Employer  
Information Requested

Occupation

Information Requested

Receipt For

2010

Primary

General

X Other (Specify) ☒

Primary 2010

Election Cycle-to-Date ☒

475.00

Date of Receipt

08 / 03 / 2008

Transaction ID: 81006.C03897

Amount of Each Receipt This Period

20.00

Receipt

SUBTOTAL of Receipts This Page (optional)

3425.00

TOTAL This Period (last page this line number only)

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**SCHEDULE A (FEC Form 3 )**  
**ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FORM LINE NUMBERS: PAGE 2001497  
(checkbox only one)  
12 11a 11b 11c 11d 14 15

Any information copied from each Report and Statement may not be used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
David Villar for U.S. Senate

A.

Full Name (Last, First, Middle Initial)  
Dorothy Oden

Mailing Address 702 Thom Boulevard

City State Zip Code  
Birmingham LA 71103

FEC ID number of contributing  
federal political committee. C

Name of Employer  
Retired Occupation Retired

Receipt For: 2010  
Primary General Election Cycle-to-Cycle V  
X Other (specify) v Special 2010 5000.00

Date of Receipt

08 / 18 / 2009

Transaction ID: 00021.C00145

Amount of Cash Receipts This Period  
200.00

Receipt

B.

Full Name (Last, First, Middle Initial)  
Roy Oden

Mailing Address 702 Thom Boulevard

City State Zip Code  
Birmingham LA 71103

FEC ID number of contributing  
federal political committee. C

Name of Employer  
Retired Occupation Retired

Receipt For: 2010  
Primary General Election Cycle-to-Cycle V  
X Other (specify) v Special 2010 1000.00

Date of Receipt

08 / 22 / 2009

Transaction ID: 01020.C02045

Amount of Cash Receipts This Period  
1000.00

Receipt

C.

Full Name (Last, First, Middle Initial)  
Dorothy Oden

Mailing Address 10000 Midland Dr

City State Zip Code  
Midland CA 92051

FEC ID number of contributing  
federal political committee. C

Name of Employer  
Retired Occupation Homemaker

Receipt For: 2010  
Primary X General Election Cycle-to-Cycle V  
Other (specify) v 2400.00

Date of Receipt

08 / 20 / 2009

Transaction ID: 00021.C07143

Amount of Cash Receipts This Period  
2400.00

Receipt

SUBTOTAL of Receipts This Page (optional) 3000.00

TOTAL This Period (last page only) 3000.00

FEC Schedule A (Form 3) (printed 10/09/09)

10044283404

10020002102



**SCHEDULE A (FEC Form 3 )  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

PCN LINE NUMBERS [ PAGE 2771487  
(check only one)  
11a ☐ 11b ☐ 11c ☐ 11d ☐  
12 ☐ 13a ☐ 13b ☐ 14 ☐ 15 ☐

Any information copied from such Reports and Statements may not be used or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to which contributions have been contributed.

NAME OF COMMITTEE (in Full)  
David Vitter for U.S. Senate

A.

Full Name (Last, First, Middle Initial)  
Joseph C. ...

Mailing Address 18038 Midcrest Dr

City State Zip Code  
Weather CA 90024

FEC ID number of contributing  
federal political committee. C

Name of Employer  
Weatherford

Occupation  
Horsehandler

Receipt For: 2010  
Primary General  
X Other (specify) ☒  
Primary 2010

Election Cycle-to-Date ☒  
4800.00

Date of Receipt

08 / 20 / 2008

Transaction ID: 80821.C57141

Amount of Each Receipt This Period  
2400.00

Receipt

B.

Full Name (Last, First, Middle Initial)  
Joseph C. ...

Mailing Address 18038 Midcrest Dr

City State Zip Code  
Weather CA 90024

FEC ID number of contributing  
federal political committee. C

Name of Employer  
US Diplomatic Corp

Occupation  
Director of Finance

Receipt For: 2010  
Primary General  
X Other (specify) ☒  
Primary 2010

Election Cycle-to-Date ☒  
2400.00

Date of Receipt

08 / 20 / 2008

Transaction ID: 80821.C57141

Amount of Each Receipt This Period  
2400.00

Receipt

C.

Full Name (Last, First, Middle Initial)  
Joseph C. ...

Mailing Address 18038 Midcrest Dr

City State Zip Code  
Weather CA 90024

FEC ID number of contributing  
federal political committee. C

Name of Employer  
US Diplomatic Corp

Occupation  
Director of Finance

Receipt For: 2010  
Primary X General  
Other (specify) ☒

Election Cycle-to-Date ☒  
4800.00

Date of Receipt

08 / 20 / 2008

Transaction ID: 80821.C57142

Amount of Each Receipt This Period  
2400.00

Receipt

SUBTOTAL of Receipts This Page (optional) >

7200.00

TOTAL This Period (last page this line number only) >

FEC Schedule A (Form 3) (Required 10/2007)

10044283405

10020082105

10044283406

## **EXHIBIT B**



Everything New Orleans

## Sen. David Vitter cleans up with donations from dry cleaning executives

By Bruce Alpert, Times-Picayune

April 08, 2010, 7:12PM

During a West Coast fund-raiser last summer, four officials with a California dry cleaning company and three of their spouses donated \$33,000 to Sen. David Vitter's re-election campaign.

The day before, Los Angeles attorney David Blumenthal, who provided more than \$100,000 in financing for the firm, US Dry Cleaning Corp., gave Vitter's campaign \$1,000.

While multiple campaign contributions from executives at the same firm are common in national politics, generally they are made in support of a candidate from the company's home state or for a member with influence over issues important to the firm's bottom line. There are no such obvious links to the Louisiana Republican and the dry cleaning business.

Jamal Ogbe, who was US Dry Cleaning's director of finance at the time of the fund-raiser, said the company was facing financial difficulties in 2009 and hoped that Vitter would help the firm gain access to federal stimulus financing or Small Business Administration Assistance. Ogbe said he was eventually reimbursed by his employer for his \$4,000 contribution. Federal campaign finance law prohibits reimbursement for such contributions.

Vitter, who opposed President Barack Obama's \$787 billion stimulus bill, would seem an odd choice to try to gain federal financing from a Democratic administration, although he does sit on the Senate Small Business Committee.

Vitter campaign spokesman Luke Boler said "Neither Sen. Vitter nor his office ever made a request on behalf of this company, but he believes that if the company violated campaign finance laws they should be prosecuted to the full extent of the law."

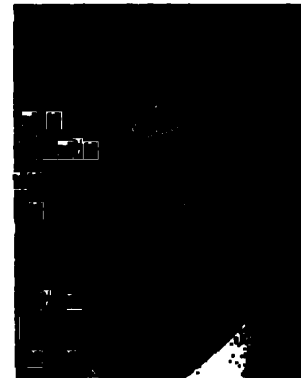
Some dry cleaning firms have urged the Environmental Protection Agency to slow efforts to phase out the chemical perchloroethylene, used by many, but not all in the industry. There have been no public statements by the senator about perchloroethylene, but he has called on the EPA not to over-regulate the chemical industry, which has a large presence in Louisiana.

On March 4, US Dry Cleaning filed for federal bankruptcy protection, while it continues to operate. Company CEO Robert Lee, wife along with his wife, Regina, contributed \$9,000 to Vitter's campaign, said in a bankruptcy court disposition that his company employs about 600 people and owns and operates 70 dry-cleaning stores with revenues exceeding \$25 million.

Lee and other company officials didn't respond to requests for a comment.

Two creditors, listed as being owed more than \$200,000 by the US Dry Cleaning Corp., said they hope that the California bankruptcy court will seek repayment of any campaign donations made by company executives. Lee, the firm's CEO, also donated \$1,000 to Sen. John Thune, R-S.D., and \$5,000 to Thune's Heartland Values Political Action Committee.

Jerry Cain, CEO of HAX Insurance, a California-based credit card services company, was among those who donated to the Vitter campaign during the senator's 2009 West Coast fund-raising effort.



The Times-Picayune

Sen. David Vitter, R-La.

Cain, who describes himself as a regular GOP donor, said a Boston-based fund-raiser contacted him last summer and asked if he would consider helping a Louisiana Republican who was at risk of losing his seat to a Democrat. Cain said he was on the fence about giving, until Vitter personally phoned him and asked him to attend a California fund-raising dinner.

Cain donated \$2,400, and attended the "informal" dinner with "no speeches but "plenty of time" for personal discussions with the senator. Cain said he "knew all about" Vitter's 2007 apology after his name appeared on the phone list of a Washington escort service, but said he judges politicians about "what they do in their public responsibilities, not their private lives."

"And he's been a good Republican senator," Cain said.

Vitter, who this week reported that he has \$5 million available for his 2010 Senate race, is being challenged by U.S. Rep. Charlie Melancon, a Democrat from Napoleonville.

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